



**AmericanCoatings**  
ASSOCIATION<sup>SM</sup>

April 1, 2017

Ana Corado and Niva Kramek  
Chemical Control Division  
Office of Pollution Prevention and Toxics (OPPT)  
Environmental Protection Agency  
1200 Pennsylvania Ave. NW.  
Washington, DC 20460-0001

RE: ACA Request for Extension of Comments on Methylene Chloride and N-Methylpyrrolidone (NMP); Regulation of Certain Uses Under Toxic Substances Control Act (TSCA) Section 6(a); Docket # EPA-HQ-OPPT-2016-0231

Dear Ms. Corado and Ms. Kramek:

The American Coatings Association (“ACA”) requests an extension of the comment deadline of 120 days to August 12, 2017 for the Toxic Substances Control Act (“TSCA”) Methylene Chloride and N-Methylpyrrolidone (NMP) Rule. This proposal is especially important to our industry given that both Methylene Chloride and NMP may be banned as a result of this rulemaking. We are in the process of trying to address all the various elements of this proposal including the economic assessment; hazard and exposure assessment and alternatives, however we need additional time to do so.

ACA is a voluntary, non-profit trade association working to advance the needs of the paint and coatings industry and the professionals who work in it. The organization represents paint and coatings manufacturers, raw materials suppliers, distributors, and technical professionals. ACA serves as an advocate and ally for members on legislative, regulatory and judicial issues, and provides forums for the advancement and promotion of the industry through educational and professional development services. ACA’s membership represents over 90% of the total domestic production of paints and coatings in the country.

Please let me know if you have any questions.

Respectfully Submitted,

/s/

David Darling, Vice President, Health, Safety, and Environmental Affairs

